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Attorneys for Catlin Insurance Company
Our File No. 94407a SME

CATLIN INSURANCE COMPANY,

Plaintiff

AGAINST

CHAMP CONSTRUCTION
COMPANY, AMERICAN EMPIRE
INSURANCE COMPANY,
MERCHANTS MUTUAL
INSURANCE COMPANY,
NAVIGATORS SPECIALTY
INSURANCE, AXIS INSURANCE,
NAVIGATORS INSURANCE
COMPANY, GZA
GEOENVIRONMENTAL, INC., also
known as GOLDBERG ZOINO
ASSOCIATES OF NEW YORK P.C.,
COMMERCE & INDUSTRY
INSURANCE, ACE AMERICAN
INSURANCE COMPANY, GILSANZ,
MURRAY, STEFICEK,LLP,
CONTINENTAL CASUALTY
COMPANY,
JOHN DOES 1-10 (said persons
being unknown and fictitious) and
ABC COMPANIES 1-10 (said
entities being unknown and
fictitious),

Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW
YORK
CASE NO.: 1:24-CV-4499-LJL

Civil Action

**DECLARATION OF
SHAJI M. EAPEN, ESQ.**

I, Shaji M. Eapen, of full age, in lieu of an Affidavit, hereby state and declare as follows:

1. I am an attorney at law in the State of New Jersey, associated with the law firm of Methfessel & Werbel, attorneys for Plaintiff Catlin Insurance Company, and in such capacity I am fully familiar with the facts of the within matter.

2. Attached as **Exhibit A** is an accurate copy of Goldberg-Zoino Associates of New York, P.C. i/s/h/a GZA Environmental Inc. a/k/a Goldberg Zoino Associates of New York P.C's (hereinafter "GZA") contract with Broadway 371, LLC.

3. Attached as **Exhibit B** is an accurate copy of StructureTech Engineering PC's Forensic Investigation Report dated August 26, 2020.

I swear under penalty of perjury that the foregoing is true and correct.

METHFESSEL & WERBEL, ESQS.

Attorneys for Catlin Insurance
Company



By: _____

Shaji M. Eapen

DATED: January 27, 2025